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Date: 1/22/97 12:06 PM

Priority: Normal

O: F-ARM-NPRM-COMMENTS at ARM Subject: Grand Canyon Overflights

FAA-03-14715-34



Comments on the Grand Canyon Overflight rule and new proposed rule announced 12/31/96.

Congress passed the 1987 Overflights Act recognizing that there were already too many flights; now there are twice as many. While virtually every other form of Grand Canyon visitation is limited, the FAA seems incapable of grasping the concept that such restrictions are necessary to protect the resource and the visitor experience. Secretary of Interior Bruce Babbitt has announced a final rule regarding aircraft overflights in Grand Canyon. Unfortunately, it is significantly weaker than we had hoped.

The FAA was directed by two acts of Congress, as well as Executive Order, to restore natural quiet to Grand Canyon; this rule won't even come close. The FAA also announced a proposed rule which could mandate conversion to quieter aircraft over the next decade. The proposal places tour aircraft into three categories, with Category A being the loudest, Category C the quietest technology currently in use. Proposed noise criteria are obviously too lenient, however, as a Bell Jetranger helicopter is placed in Category B, which won't be phased out for a decade. In fact, no helicopters - often cited as the most offensive of aircraft in use - fall into Category A, which are due for phase out by the turn of the millennium. The rule also suggests establishing a tour route over National Canyon, through a flight free zone, limited to Category C aircraft. Since even the quietest aircraft operate at decibel levels which require the use of headphones to prevent hearing loss, it is unacceptable to allow any aircraft to operate in any flight free zone. The zone protecting National Canyon was one of the slight wins within the final rule, and should not be case aside.

As a private citizen and an avid backpacker, I would like to stress that:

- * Tour operators should be required to convert to the quietest technology available.
- * We should not allow whatever gains are made by this conversion to be lost by allowing more aircraft into the airspace. The cap on the number of aircraft should be firm and permanent.
- * Specifications for categorizing an aircraft's noise efficiency should be more stringent than those proposed.
- $\boldsymbol{\ast}$ No aircraft even the less noisy ones should be granted a route through a flight free zone.

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